

CITY AND COUNTY OF SAN FRANCISCO



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VIA E-MAIL & U.S. MAIL

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United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Nicholas van Aelstyn
Beveridge & Diamond, PC
456 Montgomery Street
San Francisco, CA 94104

Re: Yosemite Creek Superfund Site, San Francisco, CA

Dear Counsel:

This responds to the question posed by the EPA regarding the City and County of San Francisco's (the City) sewer cleaning and maintenance program, as well as the PRP Group's request for data possessed by the City indicating the presence of contaminants in the combined sewer overflows discharged into Yosemite Creek.

I. City's Sewer System Preventative Maintenance Program

Sewage within the City's combined sewer system reaches the City's treatment plants through a conveyance system that starts with business or residential side sewer connections to local sewers in the streets. The local sewers flow to "major" sewers and the major sewers flow to transport storage boxes before reaching the treatment plants through either gravity flow or force (pumped) mains. The City's sewage system consists of over 900 miles of sewers.

The City's preventative maintenance program for its combined sewer system and combined sewer discharge structures is based on USEPA's Combined Sewer Overflow (CSO) Control Policy, which has been codified in the Clean Water Act. As set forth in the City's NPDES permit, SFPUC's Wastewater Enterprise complies with the nine minimum controls and long term control plan requirements of the Policy. The operation and maintenance programs employed by the City include maximizing the use of the sewage collection system for storage, maximizing the flow of combined sewage to the sewage plants for treatment, and providing treatment through baffles at weirs at the discharge structures. In the area of Yosemite Creek, the Griffith Pump Station must operate at a maximum rate of 120 MGD with a simultaneous maximum flow rate of 250 MGD at the Southeast treatment plant during wet weather conditions. To ensure that the sewer system performance achieves these and other flow rates, the City conducts preventive maintenance on all facilities before October 15 each year. This includes an annual inspection of main sewer lines and CSO structures.

Every year City staff conduct inspections and maintenance of major sewers to ensure that those lines are free of debris. Given the size of the system, the City does not inspect the entire

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system in any given year. The preventive maintenance program aims to perform a complete maintenance cycle of the main sewer system within 10 years. During the first ten months of the current fiscal year 2008-2009, Sewer Operations has inspected 89 miles, and cleaned 48 miles of sewer lines (as of May 1, 2009). The main sewer lines are cleaned on an as needed basis.

The second major component of the City's preventative maintenance program consists of an annual inspection of all of the City's CSO locations, for a total of 1.5 miles, as well as transport storage boxes upstream of the CSO outfalls. Each year, SFPUC staff inspect the CSO structures for structural integrity and debris (i.e., sludge, silt, grease, rocks, bricks, etc.) buildup. These structures are also cleaned as needed.

The CSO structures were purposefully designed to collect minimal debris. The transport storage boxes "self clean" because a proper gradient for sanitary sewage was constructed within the transport storage structure. This design feature increases the velocity of sanitary sewage within the box, preventing the solids from settling out and accumulating, and scouring the box. These design features are illustrated in the enclosed as-built and cross-section drawings prepared in connection with the Yosemite and Fitch Outfalls Consolidation project. SFPUC annual visual inspections confirm that the solids are in fact prevented from accumulating, and instead are conveyed to the treatment plant. For example, operational notes from the 2008 inspection stated "Concrete structure in good condition, weir walls in good condition, baffle walls in good condition, nothing noted as far as visible problems, debris or odors." Readily available inspection notes dating back to 2003 are consistent with last year's inspection.

When debris is found, whether through the main sewer or CSO structure inspections, it is removed by either a sewer cleaning contractor, Sewer Operations' service crews, or by process cleaning. (Process cleaning refers to the ability to use treatment plant effluent to flush the transport storage boxes.) SFPUC has spent approximately \$1 million per year for the past five years on sewer cleaning contracts, and approximately \$4 million per year on cleaning and inspection by SFPUC staff. On average, approximately 700 cubic yards of debris are removed system-wide annually. The debris is first decanted and then sent to a landfill.

A major component of the City's preventative maintenance program is the City's Pretreatment and Pollution Prevention (P2) program, which prevents debris and other foreign matter from entering the sewer system. This program includes:

- Street Sweeping. SFPUC controls the flow of sediment and debris into the sewer system by annually funding a \$5 million street sweeping program. Through this program, pollutants that adhere to sediment are kept out of the system. The street-sweeping effort is performed by the San Francisco Department of Public Works (DPW). In 2008, DPW swept 135,659 curb miles and another 44,714 uncontrolled miles, for a total of 180,373 miles of sweeping. High-use areas are swept daily or three times per week. Most other areas are swept weekly. Some small alleys are swept monthly or less frequently on an as-needed basis. A total of 28,043 net tons of dirt, sand, contaminants and other debris were removed from city streets during 2008 (about 2,850 loads of debris per month). DPW personnel also keep many toxics off the streets and out of the environment by picking up batteries, tires, and e-waste.
- Fats, Oils & Grease (FOG): SFPUC's FOG Control Program reduces grease discharged to the sewer system to improve the performance and hydraulic carrying capacity of the sewer pipes.
- Mercury: SFPUC's Mercury Reduction Program virtually eliminates the discharge of mercury to the sewer system through inspections and enforcement at

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dental offices and collection of other mercury-containing waste products (such as fluorescent lights and bulbs and mercury thermometers) from residents, municipal buildings and commercial entities.

- Pesticides/Integrated Pest Management (IPM): SFPUC's Pesticide Reduction Program reduces pesticide discharges to the sewer system through residential outreach and education, and implementation of the City's IPM program, which reduces the municipal use of pesticides to minimize contamination by irrigation or storm water runoff.
- Storm Water P2 Program/Construction Runoff Control: SFPUC's Storm water Pollution Prevention Program reduces the amount of polluted storm water runoff entering the combined sewer system through construction site inspections and enforcement activities, providing technical assistance to commercial and industrial businesses, developing and implementing a low-impact design (LID) program, and educating residents.

Finally, SFPUC staff inspect wet weather discharge samplers in September of each year to ensure that they are ready to sample in the event of a wet weather discharge.

II. Yosemite Creek Combined Sewer Discharge Data

Enclosed is an Excel spreadsheet containing sampling data for discharge events from the Yosemite Creek outfalls collected between January 1997 and December 2008. On March 18, 2009, I advised the PRP Group that the City may have data going back to 1994. As it turns out, the available data only goes back to 1997. Beginning in 2002, the Regional Water Board eliminated the sampling requirement for discharge events. SFPUC has since resumed a sampling program for discharge events.

Please do not hesitate to contact me if you need further information.

Very truly yours,

DENNIS J. HERRERA
City Attorney



Elaine M. O'Neil
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Enclosures (2)

cc: Tommy Moala
John Roddy, Esq.